

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE JPMORGAN CHASE & CO.) Master File No. 1:12-cv-03852-GBD
SECURITIES LITIGATION)
) CLASS ACTION
)
)

**SUPPLEMENTAL DECLARATION OF DANIEL L. BERGER IN FURTHER
SUPPORT OF (A) LEAD PLAINTIFFS' MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT AND PLAN OF ALLOCATION AND (B) CO-LEAD
COUNSEL'S MOTION FOR AN AWARD OF ATTORNEYS' FEES AND
REIMBURSEMENT OF LITIGATION EXPENSES**

I, Daniel L. Berger, declare as follows:

1. I am a partner in the law firm of Grant & Eisenhofer, P.A. ("G&E"), one of the Court-appointed Co-Lead Counsel in the above-captioned action (the "Action"). I submit this declaration in further support of (i) Lead Plaintiffs' Motion for Final Approval of Class Action Settlement and Plan of Allocation, and (ii) Co-Lead Counsel's application for an award of attorneys' fees in connection with services rendered in the Action, as well as for reimbursement of expenses incurred in connection therewith. I have personal knowledge of the matters set forth in this Declaration and, if called upon, I could and would testify competently thereto.

2. Attached hereto as Exhibit 1 is the Supplemental Declaration of Daniel J. Marotto, dated May 3, 2016.

3. Attached hereto as Exhibit 2 is the Objection of [sic] Proposed Settlement of Kenneth John Babin, dated March 13, 2016, in *In re JPMorgan Chase & Co. Secs. Litig.*, No. 1:12-CV-03852-GBD, ECF #206-6 (S.D.N.Y.).

4. Attached hereto as Exhibit 3 is the Objection of Jeff M. Brown to Proposed Settlement and Notice of Intent Not to Appear at Fairness Hearing, dated April 18, 2016, in *In re JPMorgan Chase & Co. Secs. Litig.*, No. 1:12-CV-03852-GBD (S.D.N.Y.).

5. Attached hereto as Exhibit 4 is an order dated January 22, 2014, in *In re Sanofi-Aventis Sec. Litig.*, No. 1:07-cv-10279-GBD, ECF #282 (S.D.N.Y.).

6. Attached hereto as Exhibit 5 is a transcript of proceedings, dated July 28, 2015, in *In re Celestica, Inc. Sec. Litig.*, No. 1:07-cv-312-GBD-MHD, ECF #269 (S.D.N.Y.).

7. Attached hereto as Exhibit 6 is the Objection of Jeffrey M. Brown to Proposed Settlement and Notice of Intent to Appear, dated December 16, 2013, in *In re Sanofi-Aventis Sec. Litig.*, No. 1:07-cv-10279-GBD, ECF #273 (S.D.N.Y.).

8. Attached hereto as Exhibit 7 is the Objection of Jeff M. Brown to Proposed Settlement, dated July 6, 2015, *In re Celestica Inc. Secs. Litig.*, No. 1:07-cv-00312-GBD-MHD, ECF #264-1 (S.D.N.Y.).

9. Attached hereto as Exhibit 8 is a chart showing cases in which Jeff M. Brown has filed objections to proposed settlements, and the disposition of those objections.

10. Attached hereto as Exhibit 9 is the Objection of Patrick S. Sweeney to Proposed Settlement, dated November 11, 2015, in *In re Polyurethane Foam Antitrust Litig.*, Index No. 10-MD-2196 (JZ), ECF #1968 (N.D. Ohio).

11. Attached hereto as Exhibit 10 is the Objection of Jeff M. Brown to Proposed Settlement and Notice of Intent to Appear, dated February 15, 2016, *In re ITT Educ. Serv., Inc. Secs. Litig.*, No. 13-cv-1620 (JPO), ECF #89 (S.D.N.Y.).

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 3, 2016.


Daniel L. Berger